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7 James R. Glidewell Dental Ceramics, Inc.
d/b/a Glidewell Laboratories

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11 UNITED STATES DISTRICT COURT
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13 CENTRAL DISTRICT OF CALIFORNIA
14 SOUTHERN DIVISION

15 2012 NOV 19 PM 3:22
16 BY
17 C/O U.S. DISTRICT COURT
18 SANTA ANA
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20 JAMES R. GLIDEWELL DENTAL
CERAMICS, INC.,
Plaintiff,
vs.
KEATING DENTAL ARTS, INC.,
Defendant.

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28
AND RELATED
COUNTERCLAIMS.

Case No. SACV11-01309-DOC(ANx)

**DECLARATION OF GARY
PRITCHARD IN SUPPORT OF
PLAINTIFF'S *EX PARTE*
APPLICATION TO FILE CERTAIN
DOCUMENTS UNDER SEAL IN
SUPPORT OF JAMES R.
GLIDEWELL DENTAL CERAMICS,
INC.'S MOTIONS FOR SUMMARY
JUDGMENT**

Ctrm: 9D, Hon. David O. Carter

Pre-Trial Conf.: January 28, 2013
Jury Trial: February 26, 2013

Snell & Wilmer
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ORIGINAL

1 I, Gary Pritchard, declare:

2 1. I am an attorney licensed to practice law in the State of California and
 3 am an in-house counsel for Plaintiff James R. Glidewell Dental Ceramics, Inc.
 4 ("Plaintiff") in the above-entitled action. Unless otherwise stated, I have first-hand,
 5 personal knowledge of the facts stated herein and, if called to testify, could and
 6 would competently testify to those facts.

7 2. The documents identified as the Lodged Documents in Plaintiff's *Ex*
 8 *Parte* Application to File Under Seal Certain Documents in Support of James R.
 9 Glidewell Dental Ceramics, Inc.'s Motions for Summary Judgment contain
 10 discovery material produced by Plaintiff designated "Confidential" and "Attorney's
 11 Eyes Only," in accordance with the Court's January 30, 2012 Protective Order.
 12 Dkt. #19.

13 3. The documents identified as the Lodged Documents in the *Ex parte*
 14 Application contain confidential information relating to Plaintiff's business
 15 development, marketing strategies, trade secrets, and other confidential and
 16 proprietary information that, if disclosed to competitors, could cause Plaintiff
 17 substantial harm. Also, because the Lodged Documents contain information
 18 relating to Plaintiff's business development, marketing strategies, trade secrets, and
 19 other confidential and proprietary information, disclosure could result in misuse by
 20 unscrupulous third parties and competitors by replicating valuable aspects of the
 21 BruxZir brand crown, and could compromise Plaintiff's bargaining position in
 22 future business negotiations.

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L.L.P.

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(213) 929-2500

1 I declare under penalty of perjury under the laws of the United States of
2 America that the foregoing is true and correct.

3 Executed on November 19, 2012, at Negev Beach, California.

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Gary Pritchard

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DECLARATION OF GARY PRITCHARD ISO PLAINTIFF'S
EX PARTE APPLICATION TO FILE UNDER SEAL
CASE NO. SACV11-01309 DOC (ANx)

1 *Glidewell Laboratories v. Keating Dental Arts, Inc.*
 2 U.S. District Court, Central District of California, Case No. SACV11-01309-DOC (ANx)

3 **PROOF OF SERVICE**

4 I am employed in the County of Orange, State of California. I am over the age of
 5 18 and not a party to the within action; my business address is 600 Anton Boulevard,
 6 Suite 1400, Costa Mesa, CA 92626-7689.

7 On November 19, 2012, I served, in the manner indicated below, the foregoing
 8 document(s) described as **DECLARATION OF GARY PRITCHARD IN SUPPORT**
 9 **OF PLAINTIFF'S EX PARTE APPLICATION TO FILE CERTAIN**
 10 **DOCUMENTS UNDER SEAL IN SUPPORT OF JAMES R. GLIDEWELL**
 11 **DENTAL CERAMICS, INC.'S MOTIONS FOR SUMMARY JUDGMENT** on the
 12 interested parties in this action by placing true copies thereof, enclosed in sealed
 13 envelopes, at Costa Mesa, addressed as follows:

14 *Please see attached Service List*

- 15 BY REGULAR MAIL: I caused such envelopes to be deposited in the United
 16 States mail at Costa Mesa, California, with postage thereon fully prepaid. I am
 17 readily familiar with the firm's practice of collection and processing
 18 correspondence for mailing. It is deposited with the United States Postal
 19 Service each day and that practice was followed in the ordinary course of
 20 business for the service herein attested to (C.C.P. § 1013(a)).
- 21 BY FACSIMILE: (C.C.P. § 1013(e)(f)).
- 22 BY OVERNIGHT DELIVERY: I caused such envelopes to be delivered by air
 23 courier, with next day service, to the offices of the addressees. (C.C.P. §
 24 1013(c)(d)).
- 25 BY PERSONAL SERVICE: I caused such envelopes to be delivered by hand
 26 to the offices of the addressees. (C.C.P. § 1011(a)(b)).
- 27 BY ELECTRONIC MAIL: I caused such document(s) to be delivered
 28 electronically to the following email address(es): David G. Jankowski
 david.jankowski@kmob.com, Jeffrey L. Van Hoosear
 Jeffrey.vanhoosear@kmob.com , Lynda J. Zadra-Symes Lynda.zadra-
 symes@kmob.com, litigation@kmob.com; Thomas L. Gourde
 tgourdelaw@cox.net

29 I declare that I am employed in the office of a member of the bar of this court at
 30 whose direction the service was made.

31 Executed on November 19, 2012, at Costa Mesa, California.

32 
 33 Rosemary McKay

Glidewell Laboratories v. Keating Dental Arts, Inc.
U.S. District Court, Central District of California, Case No. SACV11-01309-DOC (ANX)

SERVICE LIST

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